UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY, LTD., Petitioner,

v.

GODO KAISHA IP BRIDGE 1, Patent Owner.

> Case IPR2016-01376 Patent 6,197,696 B1

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE



TABLE OF CONTENTS

I.	INTRODUCTION1				
II.	ARGUMENT2				
	A.	<i>Grill</i> is prior art because its Japanese parent, JP '371, does not support the challenged claims, and because <i>Grill</i> 's priority date predates JP '3712			
		1.	IPB has the burden of proving JP '371 supports the challenged claims, and TSMC had no obligation to disprove that in its petition		
		2.	The Board's claim construction does not support IPB's argument that JP '371 discloses claim 133		
		3.	Even if the Board applies the construction the way IPB advocates, IPB's priority claim fails9		
		4.	<i>Grill</i> benefits from the filing date of the '628 application because that application supports <i>Grill</i> 's claim 2814		
	B.		OSITA would have been motivated to combine <i>Grill</i> and <i>ma</i> with a reasonable expectation of success		
		1.	Aoyama's via pattern complements Grill23		
		2.	Grill does not teach away from Aoyama's via pattern27		
III.	CONCLUSION				
IV.	CERTIFICATION UNDER 37 C.F.R. §42.24(d)32				

TABLE OF AUTHORITIES

Cases

Bayer CropScience AG v. Dow Agro Sciences LLC, 728 F.3d 1324 (Fed. Cir. 2013)	9
<i>Dynamic Drinkware, LLC v. Nat'l Graphics, Inc.</i> , 800 F.3d 1375 (Fed. Cir. 2015)	14
In re Applied Materials, Inc., 692 F.3d 1289 (Fed. Cir. 2012)	.27
In re Gurley, 27 F.3d 551 (Fed. Cir. 1994)	.31
In re Mouttet, 686 F.3d 1322 (Fed. Cir. 2012) 25,	27
Lucent Techs., Inc. v. Gateway, Inc., 543 F.3d 710 (Fed. Cir. 2008)	2
Markman v. Westview Instruments, Inc., 52 F.3d 967 (Fed. Cir. 1995)	9
Trs. of Columbia Univ. v. Symantec Corp., 811 F.3d 1359 (Fed. Cir. 2016)	9
<i>TurboCare Div. of Demag Delaval Turbomachinery Corp. v. General Elec.</i> <i>Co.</i> , 264 F.3d 1111 (Fed. Cir. 2001)	.22

Other Authorities

Core Survival, Inc. v. S&S Precision, LLC, PGR2015-00022, Paper 8
(P.T.A.B. Feb. 19, 2016)

Rules

37 C.F.R	. §42.24	·)
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IPR2016-01376 Patent 6,197,696 B1

LIST OF EXHIBITS

Exhibit 1001:	U.S. Patent No. 6,197,696 to Aoi et al.
Exhibit 1002:	Expert Declaration of Dr. Bruce W. Smith, Ph.D.
Exhibit 1003:	U.S. Patent No. 3,617,824 to Shinoda et al.
Exhibit 1004:	U.S. Patent No. 3,838,442 to Humphreys.
Exhibit 1005:	U.S. Patent No. 6,140,226 to Grill et al.
Exhibit 1006:	U.S. Patent No. 5,635,423 to Huang et al.
Exhibit 1007:	U.S. Patent No. 5,741,626 to Jain et al.
Exhibit 1008:	C. Akrout et al., "A 480-MHz Microprocessor in a $0.12\mu m L_{eff}$ CMOS Technology with Copper Interconnects," IEEE J. of Solid-State Circuits, Vol. 33, no. 11 (November 1998).
Exhibit 1009:	J.N. Burghartz et al., "Monolithic Spiral Inductors Fabricated Using a VLSI Cu-Damascene Interconnect Technology and Low-Loss Substrates," International Electron Devices Meeting (December 1996).
Exhibit 1010:	U.S. Patent No. 6,100,184 to Zhao et al.
Exhibit 1011:	U.S. Patent No. 6,103,616 to Yu et al.
Exhibit 1012:	File History of U.S. Patent No. 6,197,696 to Aoi et al.
Exhibit 1013:	Japanese Patent Application No. 10-079371 to Aoi.
Exhibit 1014:	Certified Translation of Japanese Patent Application No. 10-079371 to Aoi.
Exhibit 1015:	Japanese Patent Application No. 11-075519 to Aoi.
Exhibit 1016:	Certified Translation of Japanese Patent Application No. 11- 075519 to Aoi.
Exhibit 1017:	U.S. Provisional Patent Application No. 60/071,628.

IPR2016-01376 Patent 6,197,696 B1

Exhibit 1018:	U.S. Patent No. 5,592,024 to Aoyama et al.
Exhibit 1019:	Transcript of Teleconference with the Board, dated November 16, 2016.
Exhibit 1020:	http://ieeexplore.ieee.org/xpl/mostRecentIssue.jsp?punumber= 4251.
Exhibit 1021:	IEEE, "Technical Digest of the International Electron Devices," 1996 International Electron Devices Meeting at San Francisco, CA, Table of Contents (December 8-11, 1996).
Exhibit 1022:	J.N. Burghartz et al., "Monolithic spiral inductors fabricated using a VLSI Cu-damascene interconnect technology and low- loss substrates," 1996 International Electron Devices Meeting at San Francisco, CA, pp. 99-102 (December 8-11, 1996).
Exhibit 1023:	http://ieeexplore.ieee.org/xpl/tocresult.jsp?isnumber=15684.
Exhibit 1024:	G. Gerosa, "Introduction to the Digital Section," IEEE Journal of Solid-State Circuits, vol. 33, no. 11, p. 1599 (Nov. 1998).
Exhibit 1025:	J. Dreibelbis, "Introduction to the Memory Section," IEEE Journal of Solid-State Circuits, vol. 33, no. 11, p. 1649 (Nov. 1998).
Exhibit 1026:	L.E. Thon, "Introduction to the Signal Processing Section," IEEE Journal of Solid-State Circuits, vol. 33, no. 11, pp. 176- 643 (Nov. 1998).
Exhibit 1027:	http://ieeexplore.ieee.org/xpl/tocresult.jsp?isnumber=156 84&filter%3DAND%28p_IS_Number%3A15684%29&page Number=2.
Exhibit 1028:	C. Akrout et al., "A 480-MHz RISC Microprocessor in a 0.12- μ m L _{eff} CMOS Technology with Copper Interconnects," IEEE Journal of Solid-State Circuits, vol. 33, no. 11, pp. 1609-16 (Nov. 1998).

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